## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE FOLLOWING CASES:

ALL BOSTON SCIENTIFIC CASES PENDING IN WAVE 13 OF MDL 2327

## NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF DR. JENNIFER ANGER

For all Boston Scientific Corporation cases pending in Wave 13 of the ETHICON, INC. MDL 2327 (Case No. 2:12-md-2327), (identified in Exhibit "A" attached hereto) Plaintiff(s) hereby adopt and incorporate by reference the Motion and Reply to Exclude Dr. Jennifer Anger from Boston Scientific Wave 4. *See* Boston Scientific MDL 2326 ECF No. 7003 (Mot. and Memo.); *see also* Boston Scientific MDL 2326 ECF No. 7173 (Reply). Plaintiffs respectfully request that the Court exclude Dr. Anger's testimony for the reasons previously set forth.

DATED: December 13, 2019

Respectfully submitted,

By: /s/ Clayton A. Clark Clayton A. Clark

Co-Lead Counsel for Plaintiffs in

MDL No. 2326

cclark@triallawfirm.com

CLARK, LOVE & HUTSON, PLLC 440 Louisiana St., Ste. 1600 Houston, Texas 77002 Telephone (713) 757-1400 Facsimile (713) 759-1217

By: <u>/s/ Aimee Wagstaff</u>

Aimee Wagstaff

Co-Lead Counsel for Plaintiffs in

MDL No. 2326

aimee.wagstaff@andruswagstaff.com

ANDRUS WAGSTAFF, P.C.

7171 W. Alaska Drive

Lakewood, Colorado 80226 Telephone: (303) 376-6360 Facsimile: (303) 376-6361

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 13, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: <u>/s/ W. Michael Moreland</u> W. Michael Moreland

CLARK, LOVE & HUTSON, PLLC 440 Louisiana St., Ste. 1600

Houston, Texas 77002

Telephone (713) 757-1400

Facsimile (713) 759-1217